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County of Riverside*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

VEM MILLER,

Plaintiff,

v.

CHAD BIANCO, in his individual and  
official capacities; COUNTY OF  
RIVERSIDE, a municipal entity; and  
DOES 1 through 100,

Defendants.

Case No.: 5:25-cv-00629 KK (DTB)

**Notice of Manual Lodging of Exhibits  
in Support of Defendants' Motion to  
Dismiss and Special Motion to Strike  
Plaintiff's Second Amended Complaint**

Judge: Hon. Kenly Kiya Kato  
Courtroom: 3  
Date: December 11, 2025  
Time: 9:30 a.m.

Complaint Filed: March 10, 2025  
Trial Date: Not Yet Set

**TO THE COURT, PLAINTIFF, AND COUNSEL OF RECORD:**

In accordance with C.D. Cal. Local Rules 5-4.2(b)(1) and 11-5.1, Defendants Chad Bianco and County of Riverside hereby provide notice that the following non-paper exhibits in support of Defendants' motion to dismiss and anti-SLAPP special motion to strike will be lodged manually with the Court via a USB drive:

1. **Exhibit A**, which is a true and correct copy of the video from the Riverside County Sheriff's Department's press conference dated October 13, 2024, obtained from <https://www.youtube.com/watch?v=F1Uj2xaUBWs>.

2. **Exhibit B**, which is a true and correct copy of the video containing Sheriff Bianco's interview with the Fox News on October 14, 2024, obtained from <https://www.youtube.com/watch?v=Ff30o9N5N2Y>.

3. **Exhibit C**, which is a true and correct copy of the video containing Sheriff Bianco's interview with the News Nation on October 13, 2024, obtained from <https://rumble.com/v5rqflb-dan-abrams-live-newsnation-bianco.html>.

4. **Exhibit D**, which is a true and correct copy of the video containing Sheriff Bianco's speech on April 12, 2025, obtained from <https://rumble.com/v6s4373-sheriff-chad-bianco-for-california-governor-apr-12-2025.html>.

5. **Exhibit E**, which is a true and correct copy of the video containing Sheriff Bianco's appearance on The Britt Mayer Show on April 11, 2025, obtained from <https://www.youtube.com/watch?v=pvaeZVfUicg>.

6. **Exhibit F**, which is a true and correct copy of the audio recording referenced by Plaintiff in second amended complaint (Dkt. No. 41 at ¶ 30), obtained from [https://drive.google.com/file/d/14RNILF2sbGvc2\\_SQRlxbqsbJ-Hw8RvhX](https://drive.google.com/file/d/14RNILF2sbGvc2_SQRlxbqsbJ-Hw8RvhX).

1 DATED: October 10, 2025

Respectfully submitted,

2 **MANNING & KASS**  
3 **ELLROD, RAMIREZ, TRESTER LLP**

4 By: /s/ Eugene P. Ramirez

5 Eugene P. Ramirez

6 Anthony J. Ellrod

7 Kayleigh Andersen

8 Natalya D. Vasyuk

9 *Attorneys for Defendants Chad Bianco and*  
10 *County of Riverside*

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 801 S. Figueroa St, 15th Floor, Los Angeles, CA 90017-3012.

On October 10, 2025, I served true copies of the following document(s) **Notice of Manual Lodging of Exhibits in Support of Defendants' Motion to Dismiss and Special Motion to Strike Plaintiff's Second Amended Complaint** described as on the interested parties in this action as follows:

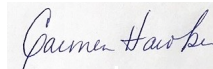
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Attorney for Plaintiff. VEM MILLER

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address carmen.hawkins@manningkass.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 10, 2025, at Los Angeles, California.



Carmen Hawkins